

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: **JOEL C. GROSHONG**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 11-02179-KMS**

**NOTICE**

PLEASE TAKE NOTICE that the Debtor has filed a Motion for Discharge, a copy of which is attached, incorporated by reference and marked as Exhibit "A".

PLEASE TAKE FURTHER NOTICE that if no objections to the Motion filed within twenty-one (21) days of the date of this Notice, the Court will consider the Motion on an *ex parte* basis. Objections to the Motion must be filed in writing with Danny Miller, the Clerk of the Court, Danny L. Miller, United States Bankruptcy Court, Southern District of Mississippi, Dan M. Russell, Jr. U.S. Courthouse, 2012 15<sup>th</sup> Street, Suite 244, Gulfport, MS 39501, and a copy of the objection must be served upon Craig M. Geno, Esq., Law Offices of Craig M. Geno, PLLC, counsel for the Debtor, at 587 Highland Colony Parkway, Ridgeland, MS 39157. In the event an objection to the Motion is filed, it will be scheduled for hearing in due course.

THIS, the 10<sup>th</sup> day of October, 2019.

Respectfully submitted,

JOEL C. GROSHONG

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By  \_\_\_\_\_

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JOEL C. GROSHONG**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 11-02179-KMS**

**MOTION FOR DISCHARGE**

COMES NOW Parker McCurley (the “Debtor” or “Movant”), and files this his Motion for Discharge (the “Motion”), and in support hereof, would respectfully show as following, to-wit:

1. On June 20, 2011, the Debtor herein filed with this Court his original petition for reorganization under Chapter 11 of the Bankruptcy Code. Subsequent thereto, Movant achieved confirmation of his Fourth Amended Plan of Reorganization (the “Plan”) by virtue of an Order entered on July 29, 2013 [DK #591].

2. Movant has filed his Motion to Approve Final Accounting [DK #1059], and has uploaded a separate order, but it has not been entered yet.

3. Movant has also filed and noticed his Motion to Close [DK #1062] and has uploaded a separate order, but it has not been entered yet.

4. Debtor has completed all of the requirements of his Plan of Reorganization and more than five years have passed since the Plan was confirmed by Order.

5. Accordingly, Debtor is entitled to receive his discharge at the present time and Debtor moves the Court for an order granting his discharge.

6. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its Order awarding the Debtor his discharge under Chapter 11 of the Bankruptcy Code. The Debtor prays for general relief.



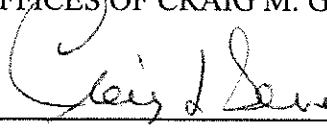
This, the 10<sup>th</sup> day of October, 2019.

Respectfully submitted,

JOEL C. GROSHONG

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno, Esq.; MSB No. 4793  
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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission and U.S. Mail, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Esq.  
Office of the United States Trustee  
[christopher.j.steiskal@usdoj.gov](mailto:christopher.j.steiskal@usdoj.gov)

THIS, the 10<sup>th</sup> day of October, 2019.

  
Craig M. Geno